

ORIGINAL

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FILED  
DISTRICT COURT OF GUAM

JUL - 2 2012 mba

JEANNEG. QUINATA  
CLERK OF COURT

6 Attorneys for the United States of America

7 IN THE UNITED STATES DISTRICT COURT

8 FOR THE TERRITORY OF GUAM

9 UNITED STATES OF AMERICA,

10 CRIMINAL CASE NO. 12-00044

11 INFORMATION

12 Plaintiff,

13 **DRIVING UNDER THE INFLUENCE  
14 OF ALCOHOL**

15 [16 G.C.A. § 18102(a) and 18 U.S.C. §§ 7(3)  
16 and 13]  
17 (Count 1)

vs.

18 **DRIVING UNDER THE INFLUENCE  
19 OF ALCOHOL (BAC)**

20 [16 G.C.A. § 18102(b) and 18 U.S.C. §§ 7(3)  
21 and 13]  
22 (Count 2)

23 Defendant.

24 **RECKLESS DRIVING**

25 [16 G.C.A. § 9107(a) and 18 U.S.C. §§ 7(3)  
26 and 13]  
27 (Count 3)

28 THE UNITED STATES ATTORNEY CHARGES:

29 **COUNT I – DRIVING UNDER THE INFLUENCE OF ALCOHOL**

30 On or about May 3, 2012, in the District of Guam, the defendant, MARK ALAN  
31 BROWN, at U.S. Naval Base Guam, on land acquired for the use of the United States and under  
32 the concurrent jurisdiction thereof, did operate and was in physical control of a motor vehicle

1 while under the influence of alcohol, in violation of Title 16, Guam Code Annotated, Section  
2 18102(a) (as enacted on June 22, 1993, Public Law 22-20), and Title 18, United States Code,  
3 Sections 7(3) and 13.

4 **COUNT II - DRIVING UNDER THE INFLUENCE OF ALCOHOL (BAC)**

5 On or about May 3, 2012, in the District of Guam, the defendant, MARK ALAN  
6 BROWN, at U.S. Naval Base Guam, on land acquired for the use of the United States, and under  
7 the concurrent jurisdiction thereof, did operate and was in physical control of a motor vehicle  
8 while he had 0.08% or more, by weight, of alcohol in his blood, in violation of Title 16, Guam  
9 Code Annotated, Section 18102(b) (as enacted on June 22, 1993, Public Law 22-20), and Title  
10 18, United States Code, Sections 7(3) and 13.

11 **COUNT III – RECKLESS DRIVING**

12 On or about May 3, 2012, in the District of Guam, the defendant, MARK ALAN  
13 BROWN, at U.S. Naval Base Guam, on land acquired for the use of the United States and under  
14 the concurrent jurisdiction thereof, did drive his motor vehicle upon a highway in willful and  
15 wanton disregard for the safety of persons and property thereon, in violation of Title 16, Guam  
16 Code Annotated, Section 9107(a), and Title 18, United States Code, Sections 7(3) and 13.

17 DATED this 2<sup>nd</sup> day of July, 2012.

18 ALICIA A.G. LIMTIACO  
19 United States Attorney  
20 Districts of Guam and NMI

21 By:

22   
23 MICHAEL E. JONES  
24 Special Assistant U.S. Attorney